Question 1: What interest do you have in deploying outdoor or standard power Wi-Fi or other licence exempt RLANs in the Lower 6 GHz band? Please provide details of the types of expected deployments.

While AXON is a pure software company, we do work very closely with Wi-Fi System Original Design Manufacturers (ODMs) to design and support hardware solutions (Wi-Fi, PON, 4G, 5G, etc.) for our mutual customers. In the future, we intend to support our existing UK customers in the deployment of outdoor standard power Wi-Fi devices. Specific use cases include Multi-Dwelling Units (MDUs), enterprise, shopping malls, parks, stadiums and other such public areas. These example use cases would benefit from the additional capacity afforded by the Lower 6 GHz band and the ability to leverage standard power would aid in overall coverage and quality of experience for end customers and cost efficiency for the managing Internet Service Provider (ISP).

Question 2: Are you interested in providing or developing AFC databases for use in the Lower 6 GHz band in the UK?

Yes, AXON is interested in providing AFC databases for use in the Lower 6 GHz band in the UK. Given our experience developing an AFC database for use in the United States and Canada, we believe our platform is directly extendable for use in the UK. Of course, it would need to be modified to interact with UK-specific fix emitter and certified Wi-Fi device databases. Given our flexible AFC architecture, UK-specific terrain and clutter maps can be readily leveraged for propagation and path-loss analysis.

Question 3: Do you have any views on the operational considerations of setting up and running AFC databases?

AXON applauds your aim to follow the approach set out by the FCC for AFC System. Specifically, AXON believes publicly accessible cloud-based AFC system with a standardized and secure AFC device to AFC System interface specification is the most cost efficient and scalable approach. Given current implementation in millions of Wi-Fi 7 devices, AXON would suggest adoption of the Wi-Fi Alliance AFC System to AFC Device Interface Definition with the expansion to include a UK ruleset identifier.

Question 4: Do you have any views on how we should manage the approval process for AFC databases and, in particular, whether we should rely on parts of the FCC process rather than requiring the whole process to be re-run in the UK?

AXON supports adopting a similar approval process use in the United States and Canada. There are labs worldwide that are certified by Wi-Fi Alliance for conducting the tests and

have experience working with current AFC System operators. Further, the public trial portion of the FCC certification allows for stakeholders to directly ensure that AFC Systems provide the requisite protections for their incumbent services. Given Ofcom would need to ensure a baseline level of in-country functionality, AXON would suggest following both a lab certification and public trial protocol.

Question 6: Do you have any comments on our proposal to use a "phased" approach, or on the alternative to wait for European harmonisation?

AXON supports a "phased" approach which provides for expedited access to the upper 6 GHz band. Any future harmonization can be address via the AFC System or firmware upgrade of the fielded Wi-Fi devices.

Question 7: Do you have any comments on the above suggestion to manage any "legacy" Wi-Fi devices, or alternative suggestions?

AXON supports Afcom's suggested approach to "legacy" devices for upper 6 GHz operation. We see this approach as a logical and sensible path forward while allowed for expedited access to the band for early Wi-Fi utilization providing short term value to consumers and stakeholders.

Question 16: Do you have any comments on our proposal to authorise the use of low-power indoor Wi-Fi access points and client devices to use 6425–7125 MHz?

AXON supports Afcom's suggested proposal allowing LPI devices to operate in the 6425-7125 MHz band. Similar to the phased approach, this will allow expedited access to the band for indoor use while preserving the option for standard power indoor or coordinated use at a later date. Any subsequent modification to this approach could be supported via device software update.

Thank you for providing AXON the opportunity to review and reply to your 6 Ghz Wi-Fi proposals.